

**McLAUGHLIN & STERN, LLP**

FOUNDED 1898

**BRETT R. GALLAWAY**

Partner

bgallaway@mclaughlinstern.com

(212) 448-1100

260 MADISON AVENUE  
NEW YORK, NEW YORK 10016

(212) 448-1100

FAX (212) 448-0066

www.mclaughlinstern.com

MILLBROOK, NEW YORK

GREAT NECK, NEW YORK

WEST PALM BEACH, FLORIDA

NAPLES, FLORIDA

March 17, 2022

**Via ECF**

Hon. Katherine Polk Failla  
United States District Court  
40 Foley Square  
Courtroom 618  
New York, New York 10007

**MEMO ENDORSED**

Re: Joint Letter Motion for Extension of Time to Submit Settlement Papers  
Gonzalez, et al. v. Ninth Ave. Kitchen Corp., et al., 1:21-cv-1158 (KPF)

Dear Judge Failla:

Pursuant to Local Rule 7.1(d) and Your Honor's Individual Rule of Practice 2(D), Defendants in the above-referenced matter write to respectfully request that the deadline to submit the parties' settlement papers, presently set for March 18, 2022, be extended to April 22, 2022.

The reason for this request is because Defendants are presently abroad in a remote part of Thailand with no means to access electronic communications, and as such are unable to execute the settlement papers until their return in mid-April. There have been three (3) previous requests for an extension of time in this case; two such requests, to extend Defendants' Answer deadline and to extend deadline to file settlement agreement, were granted by the Court. Plaintiffs' counsel consents to this request to extend the deadline to submit the parties' settlement papers to April 22, 2022.

Thank you for your attention to the above.

Respectfully jointly submitted,

/s/ Brett R. Gallaway

Brett R. Gallaway, Esq.

McLaughlin & Stern LLP

260 Madison Avenue

New York, New York 10016

*Attorneys for Defendants*

Application GRANTED. The parties are directed to submit their settlement papers on or before April 22, 2022. The Clerk of Court is directed to terminate the motion at docket number 30.

Dated: March 18, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE